

United States District Court					
SOUTHERN DISTRICT OF FLORIDA-MIAMI DIVISION					
CRUZ VALDIVIESO FIGUERA,  Plaintiffs,  vs.  ALL VIP CARE INC. AND LIZ VELAZQUEZ MCKINNON,  Defendants.			<b>DEFENDANT/COUNTER-PLAINTIFF (ALL VIP CARE, LLC)</b>  <b><u>TRIAL EXHIBIT LIST</u></b>  <b>CASE NO.: 0:22-CV-61553-DIMITROULEAS/HUNT</b>		
PRESIDING JUDGE  <b>HONORABLE WILLIAM P. DIMITROULEAS</b>		PLAINTIFF'S/COUNTER-DEFENDANT ATTORNEY  <b>FAIRLAW FIRM Brian H. Pollock, Esq. 135 San Lorenzo Ave Suite 770 Coral Gables, FL 33146</b>		DEFENDANT'S /COUNTER-PLAINTIFF'S ATTORNEY  <b>FLORIDA HEALTHCARE LAW FIRM. Randy M. Goldberg Esq., 151 NW 1<sup>st</sup> Avenue., Delray Beach, FL 33444</b>	
TRIAL DATE(S)  <b>October 23, 2023</b>		COURT REPORTER		COURTROOM DEPUTY	
PLTF. NO	DATE OFFERED	MARKED	OBJECTIONS	ADMITTED	Exhibit
1			A, H, R, UP		<b>Independent Contractor Agreement &amp; sub parts between parties. (25pgs)*</b>
2			A, R, H, UP,		<b>All VIP Care Home Agency License from State of Florida.</b>
3			A, R, H, UP		<b>All VIP Care Nurse Registry License from State of Florida.</b>
4			A, H, C		<b>Affidavit of Angela Melendez</b>
5			A, H, C		<b>Statement of Angela Melendez</b>
6			A, H, C		<b>Statement by Diana Ramirez of Angela Melendez</b>
7			A, H, R, NP		<b>AHCA Profile Report on Plaintiff</b>

Objection Codes (per Local Rule 16.1)

1. A–Authenticity
  - I–Contains inadmissible matter (mentions insurance, prior conviction, etc.)
  - R–Relevancy
  - H–Hearsay
  - UP–Unduly prejudicial-probative value outweighed by undue prejudice
  - P–Privileged
  - NP – Not produced/disclosed before discovery cut-off

\*Plaintiff objects to the inclusion of her social security number and date of birth in this Exhibit. Plaintiff further objects to page No. All VIP 26 A 000020 for A, R, H, UP of this composite exhibit.

Defendants reserve the right to amend this exhibit list.

Submitted on October 6, 2023

/s/ Randy M. Goldberg, Esquire

Florida Healthcare Law Firm

FBN: 045187

151 NW 1<sup>st</sup> Avenue

Delray Beach, FL 33444

754-224-0867

[Randy@FloridaHealthcarelawFirm.com](mailto:Randy@FloridaHealthcarelawFirm.com)

[RMGESquire@gmail.com](mailto:RMGESquire@gmail.com)